

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) No. 4:19-cr-563 AGF-NCC  
                                )  
DAVID E. KNOWLES,         )  
                                )  
Defendant.                 )

**UNITED STATES' SUPPLEMENTAL RESPONSE TO DEFENDANT'S MOTION TO RECONSIDER BOND DETERMINATION AND FOR IMMEDIATE RELEASE**

The United States of America, through undersigned counsel, respectfully provides this supplemental response with respect to Defendant David E. Knowles' Motion to Reconsider Bond Determination and for Immediate Release (Doc. 33). The Court has set a status hearing on this matter for April 15, 2020 (Doc. 36).

Defendant is presently in federal custody pursuant to a writ from State custody on charges in Franklin County (18AB-CR03186) for first degree sodomy (victim under the age of 12 years), first degree statutory rape (victim under the age of 14 years), and first degree child molestation. In his motion for release from federal custody, the Defendant states that "Mr. Knowles' attorney is seeking release in that case." Doc. 33, at footnote 4.

On April 13, 2020, the undersigned communicated with the Assistant Prosecuting Attorney for Franklin County who is handling Defendant's case, and was advised that: Defendant is held on a \$100,000 bond in his Franklin County charges, and that Defendant's attorney has not filed a motion for Defendant's release (nor has she verbally communicated that request with the

prosecutor). In addition, the Franklin County prosecutor advised that a status hearing that was set for April 14, 2020, was continued to May 12, 2020.

The Government concurs with Pre-trial Services that there is no condition or combination of conditions that assures the safety of the community and the Defendant's appearance at future proceedings, and respectfully requests that this Court deny Defendant's Motion.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s/ Kyle T. Bateman  
Kyle T. Bateman, Bar No. #996646 DC  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Kyle T. Bateman  
Kyle T. Bateman, Bar No. #996646 DC  
Assistant United States Attorney